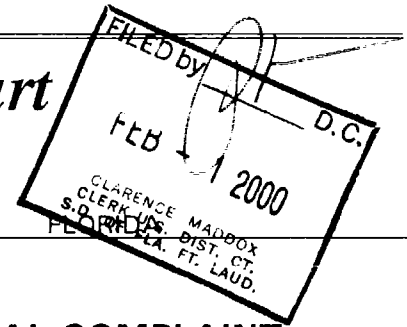


United States District Court

SOUTHERN

DISTRICT OF

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

SAUL JACKSON

CASE NUMBER:

00-4019-SNOW

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 31, 2000 in Broward County, in the Southern District of Florida, the defendant, SAUL JACKSON, did knowingly and intentionally have possession of an unauthorized INS entry stamp device and plate in the likeness of a plate designed for the printing of INS entry permits.

in violation of Title 18 United States Code, Section 1546(a)

I further state that I am a(n) Special Agent/INS and that this complaint is based on the following facts:
Official Title

PLEASE SEE ATTACHED AFFIDAVIT

Continued on the attached and made a part hereof: ☒ Yes ☐ No

Signature of Complainant

RICHARD S. BENDEL, S/A

U.S. Immigration & Naturalization Svc

Sworn to before me, and subscribed in my presence,

February 1, 2000

Date

at Fort Lauderdale, Florida
City and State

LURANA S. SNOW CHIEF
UNITED STATES MAGISTRATE JUDGE
Name and Title of Judicial Officer

Signature of Judicial Officer

AFFIDAVIT

Before me the undersigned authority, on this day personally appeared Richard S. Bendel, who after being duly sworn, deposes and says.

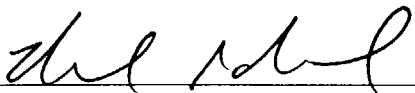
1. I am a Special Agent with the United States Immigration and Naturalization Service (INS) and have been since September 1, 1997. Prior to that I was an Immigration Agent in Tampa, Florida from December 9, 1996 to August 31, 1997. I am authorized to enforce the immigration laws of the United States, as well as related Federal criminal statutes in the performance of my duties. This affidavit is based upon my personal knowledge and information which has been provided to me by other law enforcement officers. Because this affidavit is being prepared for the limited purpose of showing probable cause for a complaint, it does not include all the details of the investigation of Saul Anthony JACKSON.
2. An INS passport entry stamp is normally placed in an alien's passport and is used to verify an alien's entry date, class of admission, port of entry, and length of stay; it is then a permit to stay in the United States for a period of time. The entry stamp can only be possessed or issued by an authorized Immigration Officer. As per U.S. Immigration and Naturalization Service usage, I know that an INS passport entry "stamp" device is also a plate in the likeness of a plate designed for the printing of such entry permits which are evidence of authorized stay in the United States.
3. I obtained information from the INS Forensic Document Lab (FDL) that a person using the name Saul JACKSON had placed an order to procure an entry stamp with a rubber stamp manufacturer in Ft. Lauderdale, Florida.
4. I contacted the stamp manufacturer and they provided a copy of the stamp to be

manufactured along with the biographical information of the purchaser. The entry stamp was to contain the words "U.S. Immigration" along with a dater which was prior to the year 2000. The biographical information of the purchaser included the name "Saul Jackson" and the address of 718 S.W. 2nd Court, Ft. Lauderdale, Florida. The stamp manufacturer stated that JACKSON had a distinctive British accent and was approximately 30 years old.

5. INS record checks revealed that an alien using the name Saul JACKSON had a birth date of November 30, 1967. Biographical record checks revealed that Saul JACKSON with that same date of birth was married to Sonia CHESAUX with a date of birth of June 22, 1970. An INS record check showed that Saul Jackson (DOB: 11/30/67) is a citizen of the United Kingdom and is, thus, not authorized to possess or use an INS stamp device.
6. A January 29, 2000, check of the address revealed that two cars were parked immediately in front of 718 S.W. 2nd Court, Ft. Lauderdale, Florida. . Florida State Department of Motor Vehicles record checks indicated that the two vehicles were registered to Sonia CHESAUX with the same date of birth as the wife of JACKSON.
7. On January 31, 2000, INS agents waited outside of the Ft. Lauderdale stamp manufacturer to await the delivery of the entry stamp. A vehicle registered to Sonia CHESAUX arrived at the business and shortly thereafter, a call was received by an employee at the business that the stamp had been purchased. Agents followed JACKSON for approximately 100 yards and initiated a traffic stop. Inside the vehicle were two occupants, Saul JACKSON and Emmett DOHERTY. Both occupants were detained for questioning. A passport obtained from the residence of Jackson verified his status as a U.K. citizen.

8. In a search of the vehicle incident to arrest, an entry stamp with the words "U.S. Immigration" was recovered between the front seats of the vehicle.
9. Based on my training and prior experience and based upon the foregoing, I believe that there is probable cause to believe that JACKSON has violated 18 U.S.C. §1546(a).

FURTHER YOUR AFFIANT SAYETH NAUGHT.



RICHARD S. BENDEL
Special Agent
U.S. Immigration and Naturalization Service
Miami, Florida

Sworn and subscribed before me this 1 day of February, 2000.



LURANA S. SNOW
UNITED STATES CHIEF MAGISTRATE JUDGE